

**McKENNA, DuPONT, STONE & WASHBURNE, PC**

Michael R. DuPont, MRD/2077

229 Broad Street

Red Bank, NJ 07701

(732) 741-6681

Attorneys for Creditor, Credit Union of New Jersey

Our File No.

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

_____	:	Chapter 13, Case No. 23-10117
RENEE INGRAM	:	Honorable JNP
	:	Confirmation Hearing: 03/15/2023
Debtors.	:	
_____	:	

**NOTICE OF OBJECTION TO CONFIRMATION OF PLAN  
PURSUANT TO BANKRUPTCY RULE 3015**

The undersigned attorneys for Credit Union of New Jersey, a secured creditor of debtor as is set forth in its Proof of Claim (No. 2), hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan on the basis of:

1. This creditor is the holder of a perfected security interest in debtors' automobile, namely a 2013 Cadillac. Debtor's plan outlines the account is unaffected and to be paid outside directly to secured creditor.
2. As outlined in the Proof of Claim filed there are arrears in the amount of \$338.44.

For the reason stated above, and for any others that the Court deems fair, creditor respectfully requests that confirmation of debtor's proposed plan be denied.

**McKENNA, DuPONT, STONE & WASHBURNE, PC**  
Attorneys for Creditor, Credit Union of New Jersey

By: /s/ Michael R. DuPont  
MICHAEL R. DuPONT, Esq.

Dated: January 31, 2023